

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) BILLY D. "RUSTY" RHOADES III, an )  
individual; )  
(2) MEGAN L. SIMPSON, an individual; )  
and )  
(3) MICHAEL S. HARRELL, an individual, )  
 )  
Plaintiffs, )

Case No. CIV-20-761-R

v. )

(1) THE STATE OF OKLAHOMA, *ex rel.* )  
GOVERNOR KEVIN STITT; )  
(2) THE STATE OF OKLAHOMA, *ex rel.* )  
THE DEPARTMENT OF PUBLIC )  
SAFETY; )  
(3) KEVIN STITT, an individual; )  
(4) CHIP KEATING, an individual; )  
(5) JASON NELSON, an individual; and )  
(6) JOE CLARO, an individual, )

Defendants.

**PLAINTIFF'S REQUESTED VOIR DIRE**

The Plaintiff, Michael S. Harrell, submits the following requested voir dire.  
The Plaintiff respectfully requests the Court to inquire further in the event of an  
affirmative response to the following questions:

1. Do you recognize any of the parties, attorneys, or assistants located in the courtroom today?
2. Are you related in any way to Billy D. "Rusty" Rhoades?
3. Are you related in any way to Megan L. Simpson?
4. Are you related in any way to Michael S. Harrell?
5. Are you related in any way to Governor Kevin Stitt?

6. Are you related in any way to Chip Keating?
7. Are you related in any way to Jason Nelson?
8. Have you had any interaction with Billy D. "Rusty Rhoades"?
9. Have you had any interaction with Megan L. Simpson?
10. Have you had any interaction with Michael S. Harrell?
11. Have you had any interaction with Kevin Stitt?
12. Have you had any interaction with Chip Keating?
13. Have you had any interaction with Jason Nelson?
14. What is your occupation and employer?
  - a. How long have you worked there?
  - b. What is your position?
  - c. How long have you held that position?
  - d. Do you supervise any employees?
15. Have you, or any member of your immediate family, been employed for any government entity? If the answer is in the affirmative, please state when, where, and identify the job title and description.
16. Have you, or any immediate member of your family, been employed in the legal field? If the answer is in the affirmative, please state when, where, and identify the job title and description.
17. Have you, or any member of your family, ever been employed in law enforcement? If the answer is in the affirmative, please state who, when, where, and identify the title and job description.
18. Have you, or any member of your family or household, or any close friend, ever been licensed as a Private Investigator? If the answer is in the affirmative, please state who, when, where, and the current status of employment as a private investigator?
19. Have you ever been called to jury duty before?

- a. Where and when?
  - b. Did you actually hear a case and/or deliberate on a verdict?
  - c. If you did hear a case and deliberate on a verdict, what kind of case was it?
  - d. Did you serve as foreperson?
  - e. Did anything happen during your experience in that case, or those cases that would affect you in deciding this case?
20. What is the last school you attended?
- a. What is the highest grade or degree you completed?
  - b. If you received a degree from college, what was your major field of study?
21. What sort of hobbies or pastimes do you participate in?
22. Do you, any of your family members, or friends work for attorneys?
- a. If so, for whom do they work?
  - b. What is their job?
23. Have you, or any of your family members, friends or acquaintances ever been a party to a lawsuit? If the answer is yes, please identify where, when, and what type of lawsuit?
- Have you ever been arrested? If the answer is in the affirmative, then:
- a. When?
  - b. Where?
  - c. For what charge or reason?
  - d. What was the result or outcome of the arrest?
24. Have you ever been incarcerated in any jail, prison, or holding facility?

25. Have you, or any member of your immediate family, filed a claim or lawsuit where you alleged your constitutional rights had been violated?
26. Do any of the prospective jurors know anyone who has been employed with the State of Oklahoma? If the answer is yes, then please state the identity of the person and the agency or office for which they are or were employed?
27. Have any of you ever had any negative experience with Governor Stitt and/or anyone associated with Governor Stitt?
  - a. If yes, then please describe your experience.
28. Have you or any member of your family had any dispute with Governor Stitt, or any officer, employee or agent, or agency, of the State of Oklahoma. If so, please explain.
29. Have you or any member of your family had any involvement as an employee or volunteer for Governor Kevin Stitt, or his campaign(s) at any time. If so, please state the date and identify your role or involvement.
30. Have you or any member of your family had any involvement as an employee or volunteer for former Governor Frank Keating, or his campaign(s) at any time. If so, please state the date and identify your role or involvement.
31. Have you or any member of your family had any involvement as an employee or volunteer for Jason Nelson, or his campaign(s) at any time. If so, please state the date and identify your role or involvement.
32. Have you or any member of your family had any involvement as an employee or volunteer for any candidate for public office, or his/her campaign, or a campaign on behalf of any issue, political party(-ies) or interest group(s), or his campaign(s) at any time. If so, please state the date and identify your role or involvement.
33. Are you a member of any clubs or organizations? If so, please state the identity of the club or organization.
34. Are you, or have you ever been, a member of any union or unions? If so, please state the identity of the union and the date(s) of your

membership.

35. Have you ever participated in any protest or demonstration at the Oklahoma State Capitol? If so, please state when and describe your experience.
36. Have you ever visited the Office of the Governor? If so, please describe your experience.
37. Are you acquainted with any of the attorneys involved in the case?
  - 1) Dustin Hopson;
  - 2) Amy Steele Neathery;
  - 3) Michael Alex Duncan;
  - 4) Ron Shinn;
  - 5) Jennie Mook.
38. Have you ever had any relationship of any sort with any of the attorneys in this action?
39. Are you acquainted with any of the following individuals, who may be called as witnesses in this case?
  - 1) Billy D. Rhoades
  - 2) Michael Harrell
  - 3) Megan Simpson
  - 4) Jason Holt
  - 5) Gary James
  - 6) Tim Tipton
  - 7) Brian Orr
  - 8) Governor Kevin Stitt
  - 9) Chip Keating

- 10) Jason Nelson
  - 11) Kathy Mires
  - 12) Donelle Harder
- 
- 40. Have you ever attended church with any of the attorneys, parties, or witnesses I have identified?
  - 41. Have you or any member of your family had any dispute with any law enforcement officer or agency, including but not limited to the Oklahoma Highway Patrol?
  - 42. Have you, or any member of your family or household, or any close friend, ever been terminated or laid off from any job? If so, state the employer and the reason for the separation from employment.
  - 43. Have you or any business you owned or operated ever been involved in a lawsuit of any kind?
  - 44. Are any of you currently involved in a lawsuit of any kind?
  - 45. Is there any reason that you believe you should not serve as a juror in this or any action in this Court?
  - 46. Is there any reason that you would be unable to consider the evidence in this, or any action, in this Court?
  - 47. Is there any reason that you believe you cannot be impartial toward any of the Plaintiffs in this action?
  - 48. Is there any reason that you believe you cannot be impartial toward any of the Defendants in this action?
  - 49. Is there any reason that you would or could not consider a verdict for either the Plaintiffs or the Defendants in this, or any other, action in this Court?

Respectfully submitted,

s/ Dustin J. Hopson

Dustin J. Hopson, OBA # 19485  
Amy S. Neathery, OBA #20344  
Hopson Legal LLC  
119 N. Robinson Ave., Suite 650  
Oklahoma City, OK 73102  
Telephone: (405) 673-7560  
Email: dustin@hopsonlawfirm.com  
Email: amy@hopsonlawfirmcom  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2023, I transmitted the foregoing document to the Clerk of Court using ECF System for filing and transmittal of a Notice of Electronic Filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W. Kirk Turner  
Jacob S. Crawford  
McAfee & Taft  
Two West Second Street, Ste. 1100  
Tulsa, OK 74103  
kirk.turner@mcafeetaft.com  
jake.crawford@mcafeetaft.com  
ATTORNEYS FOR DEFENDANTS

Ronald T. Shinn, Jr.  
Michael A. Duncan  
McAfee & Taft  
211 North Robinson, 10<sup>th</sup> Floor  
Oklahoma City, OK 73102  
ron.shinn@mcafeetaft.com  
alex.duncan@mcafeetaft.com  
ATTORNEYS FOR DEFENDANTS

/s/ Dustin J. Hopson

Dustin J. Hopson